

REMARKS

The office action and the references cited therein have been carefully considered together with the present application and amendments have been made to the claims to more accurately define the present invention and to emphasize pre-existing differences between the invention as claimed and the prior art of record.

The specification has been amended to correct minor grammatical and typographical errors.

The examiner has rejected all claims under 35 U.S.C. § 102(e) as being unpatentable over Adamske et al. (hereinafter "Adamske").

Independent claims 1 and 19 have been amended to incorporate the subject matter of claim 10, and claim 36 has been amended in a similar manner. With regard to amended claim 1, it is now believed that it is neither anticipated, taught nor suggested by Adamske, applied singularly or in combination with any of the references of record. Adamske fails to teach or suggest a personal imaging repository associated with a particular user for storing imaging data comprising digital data capable of being represented as dimensional graphics that is to be accessed by the requested web service and wherein said personal imaging repository is an exchange infrastructure between said imaging data and available web services on the internet.

The examiner identifies column 5, line 65 through column 6, line 8 and column 7, lines 4-9 and 16-27 as teaching a personal imaging repository associated with a particular user for storing imaging data that is to be accessed by the requested web service. However, after reading these identified portions of the specification,

they are not believed to describe or suggest such a repository as claimed. Adamske uses its translation server 24 to convert a printable electronic document to the web server 22 and stores that document on a centralized file server 26. The converted printable electronic document is then processed by a web server 22 to preview files for the user 10 to view. There is no discussion in this identified language that suggests that there is a personal imaging repository associated with a particular user for storing image data and wherein that personal imaging repository is an exchange infrastructure between said imaging data and available web services on the internet.

Adamske uses two separate servers, i.e., web server 22 and file server 26 rather than a single personal imaging repository to perform what it states it performs. The web server appears to function as the exchange infrastructure while the file server 26 stores the imaging data. The identified text in column 7 adds a third component, i.e., database 29 which contains pointers to where the converted document resides on the file server 26 together with information linking each stored document to a user. It also states that this third component, the database 29, also serves as the central repository for all of the electronic documents delivered to various destination printers via the web server 22.

This architecture and functionality is different from the system as claimed in amended claim 1 as well as amended claim 19. As is set forth on page 16, lines 15-25 of applicants' specification:

[T]he The system and method provides for servicing imaging data stored in a personal imaging repository by a requested web service operably connected to a computing

device requesting the service. The imaging data is stored in a personal imaging repository, which acts as an exchange infrastructure between the imaging data and available web services. Because the web services are configured to access the personal imaging repository for the imaging data using the user information, it is no longer necessary for the imaging data to be uploaded to the requested web service. Rather, once the imaging data is stored in the personal imaging repository, it can be used by any other web services or the user at a later time.

This is unlike the structure and operation described in Adamske.

Adamski also fails to teach or suggest the element of claim 1 “a requested web service for servicing the imaging data stored in said personal imaging repository responsive to a request from a user and upon having access granted to said personal imaging repository by receiving said user profile.” Because Adamski does not have a personal imaging repository, it cannot teach or suggest this element. Moreover, there is nothing analogous to the operation as set forth in this element whereby the image data stored in the repository cannot be serviced unless and until a request is made by the computing device and access to said personal imaging repository is granted upon receiving said user profile.

The arguments that have been advanced with regard to claim 1 also apply to amended claim 19 and it is therefore believed that amended claim 19 is in condition for allowance.

With respect to claim 36, it is believed that Adamski fails to teach or suggest a computer program as set forth in this claim because it does not have a personal imaging repository as has been extensively discussed with regard to claims 1

and 19 nor does it send user information to the requested web service enabling the web service to access a personal imaging repository associated with the sent user information. Because Adamski simply does not operate in the manner as set forth in this claim, it is believed that this claim is also in condition for allowance.

Since the dependent claims pending in the application necessarily include the features of the claims from which they depend, and in addition define other features or functionality, it is also believed that these claims are in condition for allowance.

For the foregoing reasons, reconsideration and allowance of all pending claims in this application is respectfully requested.

Respectfully submitted,

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